

UNITED STATES DISTRICT COURT
 for the
Eastern District of Michigan

United States of America

v.

Katelyn Jones

Case No. Case: 2:20-mj-30535
 Assigned To : Unassigned
 Assign. Date : 12/22/2020
 USA v. JONES (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 18, 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 873(c)	Threats of violence through interstate commerce

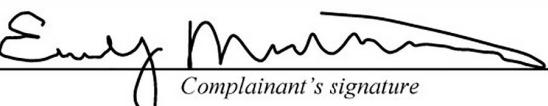
This criminal complaint is based on these facts:

Continued on the attached sheet.

Sworn to before me and signed in my presence
 and/or by reliable electronic means.

Date: December 22, 2020

City and state: Detroit, Michigan


Emily Munchiando
 Complainant's signature

Special Agent Emily Munchiando, F.B.I.
 Printed name and title


S. Whalen

Judge's signature
Hon. R. Steven Whalen, U.S. Magistrate Judge
 Printed name and title

AFFIDAVIT

I, Emily Munchiando, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation. I have been so employed since approximately September of 2014. I am currently assigned to the Violent Crime Task Force (VCTF). As part of my duties as an FBI Special Agent, I investigate criminal violations concerning crimes of violence including federal violations of Title 18 and Title 21. I have conducted numerous investigations in which the seizure of electronic devices has aided in identifying individuals responsible for or involved with various criminal activities. I have been involved in the investigation, apprehension and prosecution of individuals who use electronic devices to commit federal offenses. I understand the available technology that can be used by law enforcement to assist in identifying the users of electronic devices and their locations. I have participated in the execution of multiple federal arrest and search warrants.

2. The statements in this affidavit are based on my personal knowledge, my training and experience, and information obtained from other law enforcement personnel and from persons with knowledge regarding relevant facts. This affidavit

is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant. This affidavit does not contain all the information known to law enforcement related to this investigation.

3. Probable cause exists that Katelyn JONES transmitted threatening communications in interstate commerce, in violation of 18 U.S.C. § 875(c).

PROBABLE CAUSE

4. Adult Victim 1 (AV-1) is the Chair of the Wayne County Board of Canvassers. As a member of the Board of Canvassers, she must vote for or against the certification of election results for Wayne County, Eastern District of Michigan.

5. On November 17, 2020, AV-1 voted against certifying the election results. AV-1's vote was reported on numerous news outlets, both locally and nationally.

A. Text Message Threats

6. On November 18, 2020, at approximately 7:46 a.m., AV-1 received multiple threatening text messages from an unknown person. The text messages were sent to AV-1's cellular phone and came from phone number (269) xxx-xx68. The text messages stated the following:

- a. "Damn it was not hard finding all of your information disgusting racist bitch [AV-1's name], [AV-1's address];" and
- b. "I don't tolerate people like you, in fact I consider you to be a terrorist and do you know what happens to terrorist [AV-1's first name]???"

7. The messages were immediately followed by two graphic photographs of a bloody, deceased, nude, mutilated woman, lying on the ground. Immediately thereafter, a photograph of AV-1's daughter, who is a minor, was sent to AV-1.

8. Following the pictures, the individual subsequently sent additional text messages which stated the following:

- a. "I'd just like you to imagine that's little [AV-1's daughter's name] your beautiful daughter." The "that's" reference was to the images of the bloody deceased, nude, mutilated women;
- b. "Have you ever heard of a private opinion on your Facebook???" "I guess not;"
- c. "Fucking with our elections is TERRORISM, and us Americans clearly don't tolerate terrorist so yes you should be afraid, your

daughter should be afraid and so should [name of AV-1's husband];"

- d. "Tsk, Tsk, Tsk;" and
- e. "You have made a grave mistake [AV-1's first name] I hope you realize that now."

9. Law enforcement databases indicated that the number that sent the threatening text messages, (269) xxx-xx68, was serviced by Onvoy Spectrum. Records provided by Onvoy LLC, d/b/a Inteliquent, showed that (269) xxx-xx68 was assigned to the service provider, TextMe Inc.

10. Records provided by TextMe Inc. showed that telephone number (269) xxx-xx68 was associated with a TextMe account created on November 18, 2020 at 7:36 a.m. This account was created 10 minutes before AV-1 received the first threatening text message. The account was created by way of a specific IP address (the IP address).

11. An internet search of the IP address resolved to Comcast Cable Communications. Records provided by Comcast Cable Communications established that the subscriber to the IP address was Linda Jones in New

Hampshire. Therefore, the account that used (269) xxx-xx68 that sent threatening text messages to AV-1 was created at Linda Jones' residence.

B. Instagram Threatening Messages

12. Also on November 18, 2020, AV-1 received similar threats on AV-1's Instagram page. The threats came from someone using the Instagram username, “_etfere”. The threats were very similar to the text message threats made by telephone number (269) xxx-xx68. Instagram user, “_etfere” made comments under numerous photographs on AV-1's Instagram page including, but not limited to, the following posts:

- a. “[AV-1 phone number AV-1 address];”
- b. “[AV-1's phone number] [AV-1's husband's phone number]
[AV-1 address] Feel free to leave these disgusting racist [sic] a nice little message on their voicemail or for more fun stop by their house;”
- c. “Racist Terrorist Bitch;”
- d. “Idk [I don't know] if god would like you praying for a terrorist unless you're one too???”

- e. “@dfit1coach we want her in more pain.” The reference to “her” is AV-1;
- f. “Your Daughter is beautiful,” referring to AV-1’s daughter;
- g. “I’d be a shame if something happened to her.” This comment was posted under a picture of AV-1, AV-1’s daughter, and AV- 1’s husband; and
- h. “Hmmm I’d be a shame if something happened to your daughter at school.”

13. Based on the similarities of the threatening text messages and Instagram posts, I concluded that they were sent by the same individual. Both the text and Instagram threatening messages were sent on the same day. They both used AV-1’s name and AV-1’s address. They both referred to AV-1 as racist and as a terrorist. Both sets of messages identified AV-1’s husband and daughter. With respect to the daughter, they both referred to her as “beautiful.” Both threatened harm to AV-1’s daughter. They both incorporated an image of AV-1’s daughter in the threats. The text message threats included the bloody and mutilated woman and states that AV-1’s daughter “should be afraid.” The Instagram threats stated

“shame if something happened to her,” and “shame if something happened to your daughter at school.”

14. Instagram records associated with Instagram username “_etfere” resolved to the Instagram account, “i_dont_fukkin_play6925”. A search warrant on Instagram account, “i_dont_fukkin_play6925” revealed numerous photographs of a female. Based on how many images of the female were on the account, and the information posted in the account, it was determined that Katelyn JONES was the user of this account. The images from the Instagram account matched JONES’ Michigan driver license photograph. The address on Katelyn JONES’ driver’s license is in Olivet, Michigan.

15. The user of the “i_dont_fukkin_play6925” account provided telephone number (269) xxx-xx96 for registration and contact information. Also, telephone number (269) xxx-xx96 was used to verify the account holder.

16. Katelyn JONES, the user of “i_dont_fukkin_play6925,” is 23 years-old. Linda Jones is Katelyn JONES’ mother.

17. The telephone number associated with the Instagram account, (269) xxx-xx96, and the (269) xxx-xx68 number associated with the threatening text

messages, have the same 269 area code. Olivet, Michigan, Katelyn JONES' registered address, is in the 269 area code.

C. Locating Katelyn JONES

18. On the morning of December 10, 2020, 23 days after the threats were made to AV-1, an FBI agent conducted surveillance at Linda Jones' residence. At approximately 9:40 a.m., a white female, wearing a blue hooded sweatshirt with the hood pulled over her face, exited the residence. The white female matched the physical description of Katelyn JONES, specifically, her height and weight. The white female that matched Katelyn JONES' height and weight was observed exiting and entering Linda Jones' residence a second time later that same day.

19. On December 16, 2020, based on a review of telephonic records in conjunction with other investigative methods, law enforcement determined that the cellular telephone associated with number (269) xxx-xx96 (the number connected to the Instagram username, “_etfere”), was in an area consistent with the location of Linda Jones' residence.

D. Execution of Search Warrant at JONES' Residence

20. On December 22, 2020, FBI Agents executed a search warrant at Linda Jones' residence in New Hampshire. Katelyn JONES was located in the

residence. JONES was advised of her rights by FBI Agents. JONES waived her rights and agreed to answer questions. JONES made the following admissions:

- a. She created a TextMe account that utilized a telephone number with a “269” area code;
- b. She utilized that account to send the above documented threatening text messages to AV-1;
- c. She is the sole user of Instagram account “i_dont_fukkin_play6925”. JONES posted threatening comments from the Instagram account “i_dont_fukkin_play6925” on AV-1’s Instagram account; and
- d. She made the threats because JONES was angry that AV-1 was interfering with the election.

Conclusion

21. Probable cause exists that Katelyn JONES transmitted a threat of violence through interstate commerce, from New Hampshire to Michigan, in violation of 18 U.S.C. § 875(c).



Emily Munchiando
FBI Special Agent

Sworn to before me and signed in my presence and/or by reliable electronic means.



HON. R. STEVEN WHALEN
UNITED STATES MAGISTRATE JUDGE

December 22, 2020